Weston Solutions, Inc.
Suite 500
750 East Bunker Court
Vernon Hills, IL 60061-1450
847-918-4000 • Fax 847-918-4055
www.westonsolutions.com

14 January 2003

Mr. Steve Faryan,
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

TDD: 0106-005
Document Control No.:103-3A-ACTJ

Re: Review comments on the Confirmatory Sampling Technical Memorandum
The Lockformer Company, Lisle, Illinois

Dear Mr. Faryan:

Weston Solutions, Inc. (WESTON®) is pleased to submit review comments of the *Supplemental VOC Investigation Report for Area 3* prepared by Clayton Group Services, Inc., and dated 27 November 2002. As stated in the introductory text. this document is a supplemental presentation of soil and groundwater volatile organic compound (VOC) analytical results and stratigraphy data for work conducted in Area 3 only. For detailed descriptions of site background conditions and the results of previous investigation, the reader is referred to the Comprehensive VOC Investigation Report prepared in May 2002. WESTON also understands that continuing investigation activities are in progress in Area 3, and that this report only presents data and information available through November 2002. Therefore, comments and suggested modifications contained herein may vary upon receipt and evaluation of additional data. The review comments are provided below:

General and Specific Comments

TCE Analytical Results for Fill/Till Unit Area 3: Boring CSB1551 indicates two soil samples were collected within the fill/till unit at 2 to 4 feet and 8 to 10 feet bgs. The TCE result on this figure indicates both samples as "non-detect". However, the result for the 8 to 10 foot sample in the September 2002 "*Lockformer Work Plan*" indicates a result of 27 ug/Kg TCE.

Boring CSB1555, sample 8 to10 feet bgs, is shown as a fill/till sample; however, this sample was collected in gravelly materials indicative of the mass waste unit. Additionally, this sample is also shown on Figure 2 as a mass waste unit sample. Please review unit classifications and modify figures accordingly. Also in CSB1555, the 2 to 4 foot fill/till sample is indicated on Figure 1 as "non-detect", however, a TCE result of 11 ug/Kg is indicated for this sample in the S
September 2002 "*Lockformer Work Plan*"

TCE Analytical Results for Mass Waste Unit Area 3: Boring CSB1549 indicates one soil sample was collected within the mass waste unit at 14 to 16 feet bgs. The TCE result on this figure is indicated as "non-detect". However, the result for this sample in the September 2002 "*Lockformer Work Plan*" indicates a result of 18 ug/Kg TCE.

TCE data for the deep samples from borings CSB2115 and CSB2116 indicate TCE exceeding cleanup levels in the mass waste unit at depths up to 28 feet bgs. According to the boring logs for these borings, saturated conditions are found beneath this depth, so vertically, the TCE contamination is limited by the water table. However, laterally, no sampling has been conducted to the east (residential property) with which to define the extent of TCE in the mass waste unit in this area. Similar lack of lateral delineation is noted to the north, south, and west of boring CSB1919 (west side of Area 3); and along the entire southern perimeter of Area 3 where significant TCE levels are noted in the unsaturated portion of the mass waste unit. Further evaluation is warranted in these areas to delineate the lateral extent of TCE (and possibly PCE as described below).

Analytical data from the September 2002 "*Lockformer Work Plan*" indicates PCE is detected within the mass waste unit at elevated levels in borings CSB1562, CSB1564, 1565 and 1566 (southern boundary of Area 3); however, no mention is made of this information in the Area 3 report.

Groundwater VOC Results: Although it appears that significant shallow groundwater contamination (Primarily TCE) is present throughout Area and surrounding vicinity, no information on groundwater flow direction is presented. Some potentiometric surface contour maps have been produced for the May 2002 "*Comprehensive VOC Investigation Report*"; however, these should be updated to evaluate flow conditions within Area 3. Previous data indicates flow directions within the glacial sediments to be south-southwest. If conditions are found to be similar after evaluating all available information, then it appears that TCE groundwater contamination has likely migrated laterally off-site to the south as evidenced by TCE levels in shallow groundwater along the southern boundary of Area 3. Depending on flow directions, there is also a potential for migration off-site to the east and west of Area 3 as evidenced by TCE levels in numerous shallow groundwater samples. Additional work will be required to more fully delineate the lateral extent of TCE groundwater contamination in the shallow glacial water bearing zone.

Based on stratigraphy data presented in the cross-sections, it appears that the upper till/fill layer pinches out to the south of the site. Similarly, the lower clay layer is thin or not present in the southern portions of Area 3. The saturated mass waste unit water bearing zone (which contains TCE at elevated levels, appears in direct contact with the Silurian dolomite aquifer, allowing shallow

contamination to migrate directly to the local drinking water aquifer. TCE present in bedrock wells south of the site (1604D) appear to provide evidence that the migration pathway is complete in this area. However, it cannot be conclusively determined at this time where the contamination is entering the bedrock aquifer.

Due to significant discrepancy in the reporting of the sample results between two documents it is recommended that Clayton thoroughly verify and certify the correctness of all the data presented in the documents.

Should you have any questions or require additional information, please feel free to contact me.

Very truly yours,

Weston Solutions Inc.

Omprakash S. Patel
Senior Project Manager

cc. Ms. Gail Nabasny, U.S. EPA Project Officer